

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the estate of Bernard L.  
Madoff,

Plaintiff,

v.

CITIBANK N.A., CITICORP NORTH  
AMERICA, INC. and CITIGROUP GLOBAL  
MARKETS LIMITED,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05345 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND  
AND ADJOURNING PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Trustee may respond to the Motion to Dismiss filed by Defendants Citibank, N.A., Citibank North America, Inc. and Citigroup Global Markets Limited (the “Defendants”) is extended up to and including March 18, 2016. It is further stipulated and agreed that the Defendants shall file any reply by June 17, 2016. The return date for this matter was previously set for February 24, 2016 at 10:00 a.m., but will be rescheduled for July 27, 2016 at 10:00 a.m. The pre-trial conference will be adjourned from March 30, 2016 at 10:00 a.m. to August 31, 2016 at 10:00 a.m.

The purpose of this stipulation extension (the “Stipulation”) is to provide additional time for the Trustee to respond to the Defendants’ Motion to Dismiss. This is the twentieth such extension. Nothing in this Stipulation is a waiver of the Trustee’s right to request from the Court a further extension of time to respond to the Defendants’ Motion to Dismiss and/or the Defendants’ right to object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 10106).

*[Remainder of page intentionally left blank.]*

Dated: December 1, 2015  
New York, New York

/s/ David J. Sheehan  
David J. Sheehan  
Regina L. Griffin  
Thomas L. Long  
Melissa L. Kosack  
BAKER & HOSTETLER LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

-and-

Catherine E. Woltering  
BAKER & HOSTETLER LLP  
65 East State Street, Suite 2100  
Columbus, Ohio 43215  
Telephone: (614) 228-1541  
Facsimile: (614) 462-2616

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of Bernard  
L. Madoff Investment Securities LLC and the Estate of  
Bernard L. Madoff*

/s/ Carmine D. Boccuzzi, Jr.  
Carmine D. Boccuzzi, Jr.  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 2250-3999

*Attorneys for Defendants Citibank, N.A., Citibank North  
America, Inc. and Citigroup Global Markets, Limited*